

David K. W. Wilson, Jr.
Robert Farris-Olsen
Morrison, Sherwood, Wilson & Deola, P.L.L.P.
P.O. Box 557
Helena, MT 59624-0557
Tel: (406) 442-3261
Fax: (406) 443-7294
kwilson@mswdlaw.com
rfolsen@mswdlaw.com

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION

BRAD ALEXANDER,)	
)	Case No: CV-05-16-H-DWM
Plaintiff,)	
)	
v.)	PLAINTIFF'S MOTION FOR AN
)	AWARD OF FEES AND COSTS
JBC LEGAL GROUP, P.C., a California)	PURSUANT TO RULE 37
Professional Corporation, JBC &)	
Associates, P.C., and Jack Hagop)	
Boyajian,)	
)	
Defendants.)	

Pursuant to Rule 37 (b) (2) (C), Fed. Rules of Civ. Proc., and the schedule set at the August 18, 2014 hearing in this matter, Plaintiff hereby requests that the Court award fees and costs as supported by the attached brief, and by the filed Declaration of Plaintiff's counsel, David K. W. Wilson, Jr.

DATED this 8th day of September, 2014, in Helena, Montana.

By /s/ David K. W. Wilson, Jr.
David K. W. Wilson, Jr.
Morrison, Sherwood, Wilson & Deola, P.L.L.P.
Attorney for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was mailed, *certified and first class*, this 8th day of September, 2014, to:

Jack Hagop Boyajian
70 West Allendale Ave., Suite D
Allendale, NJ 07401

By /s/ David K. W. Wilson, Jr.
David K. W. Wilson, Jr.
Morrison, Sherwood, Wilson & Deola, P.L.L.P.
Attorney for Plaintiff